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UNITED STATES DISTRICT COURT EASTERN DISTRICT OF WASHINGTON AT SPOKANE

MICHAEL J. HANSON, an individual,

NO. 2:22-cv-00306-MKD

Plaintiff,

v.

PLAINTIFF'S RULE 26(a)(2) DISCLOSURE OF EXPERT WITNESS REBUTTAL REPORT

SUN LIFE FINANCIAL SERVICES COMPANY, INC, a foreign corporation; SUN LIFE ASSURANCE COMPANY OF CANADA, a foreign corporation,

Defendants.

Pursuant to Fed. R. Civ. P. 26(a)(2) and this Court's Second Jury Trial

Scheduling Order dated November 3, 2023, Plaintiff Michael J. Hanson makes the

following disclosure of a rebuttal expert witnesses who may be used at trial to

PLAINTIFF'S RULE 26(a)(2) DISCLOSURE OF EXPERT WITNESS REBUTTAL REPORT - 1 No. 2:22-cv-00306-MKD

GORDON TILDEN THOMAS CORDELL

600 University Street Suite 2915 Seattle, WA 98101 206.467.6477 present evidence under Federal Rules of Evidence 702, 703, or 705:

Peter Marchel, JD, MBA, CDR, RPLU, CPCU, ARM, AIS, AIM, AIC Marchel & Associates Risk Consulting 12262 337th Place N.E. Carnation, WA 98014 425.788.4349

Mr. Marchel is an expert in insurance claims handling and insurer bad faith in Washington, and may testify regarding his opinions on Sun Life's claims handling and bad faith with respect to Michael Hanson.

Mr. Marchel has reviewed the documentation obtained to-date. His rebuttal and supplemental opinions are being provided to Defendants and the Court contemporaneously with this disclosure, along with a copy of his curriculum vitae. Mr. Marchel's rates and prior testimony were previously provided to Defendants and the Court at ECF No. 39.

Defendants are deposing Mr. Marchel on February 6, 2024 at 9:30 a.m. DATED this 16th day of January, 2024.

GORDON TILDEN THOMAS & CORDELL LLP

Attorneys for Plaintiff Michael J. Hanson

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